

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**MERRITT HAWKINS
& ASSOCIATES, LLC,**

Plaintiff,

v.

**LARRY SCOTT GRESHAM,
BILLY BOWDEN, AND
CONSILIUM STAFFING, LLC,**

Defendants.

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**CIVIL ACTION NO.
13-CV-00312-P**

**DEFENDANTS GRESHAM AND BOWDEN’S RESPONSE IN OPPOSITION TO
PLAINTIFF’S MOTION FOR PARTIAL SUMMARY JUDGMENT**

TO THE HONORABLE COURT:

Pursuant to Local Rule 56.4, Defendants Larry Scott Gresham (“Gresham”) and Billy Bowden (“Bowden”) (collectively, “Defendants”) file their Response in Opposition to Plaintiff’s Motion for Partial Summary Judgment [docket nos. 61, 62, and 63], which is supported by Defendants’ concurrently-filed brief, appendix, and objection to and motion to strike MHA’s summary judgment evidence.

Each of the matters required by Local Rule 56.4(a) is set forth in the brief filed in support of this response. For the reasons set forth in their brief, Defendants respectfully request that this Court deny Plaintiff’s motion for summary judgment in its entirety. Defendants further request any such other and further relief, whether at law or in equity, to which they may be justly entitled.

Date: August 1, 2014

Respectfully submitted,

/s/ John Volney

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served as shown below on counsel of record on August 1, 2014:

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